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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

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14 SECURITIES AND EXCHANGE COMMISSION, Case No. 3:14-CV-02743-HSG (DMR)  
15 Plaintiff,  
16 v.  
17 SALEEM KHAN, et al.,  
18 Defendants,  
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**STIPULATION AND PROPOSED  
ORDER SUSPENDING DEADLINES AS  
TO DEFENDANT AKBARI**

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1 Plaintiff Securities and Exchange Commission (“Commission” or “SEC”) and defendant  
2 Ammar Akbari hereby submit the following Stipulation and Proposed Order, and request that the  
3 Court suspend upcoming deadlines as to Akbari, as follows:

4 WHEREAS counsel for the Commission, and counsel for Defendant Akbari have been  
5 working for months to determine whether a settlement of the Commission’s case as to Akbari could  
6 be reached;

7 WHEREAS the Commission’s counsel and Akbari’s counsel have arrived at a settlement in  
8 principle that the Commission’s counsel expects to recommend to the Commission itself for  
9 consideration and approval or disapproval;

10 WHEREAS the process for obtaining Commission consideration and approval requires a  
11 formal presentation of an offer to the commissioners who sit in Washington, D.C., and given the  
12 press of their business, the process typically takes approximately eight weeks to complete;

13 WHEREAS a Settlement Conference before Magistrate Judge Ryu is scheduled for March 13,  
14 2015, at which the parties and their counsel are ordered to attend;

15 WHEREAS defendant Akbari will lose much of the value of making a settlement offer early  
16 in this litigation (before the Settlement Conference and before the resumption of discovery and before  
17 his Answer is due) if he is nevertheless required to attend such events at substantial cost to him;

18 ACCORDINGLY, it is HEREBY STIPULATED by and between the undersigned parties that  
19 Defendant Akbari should be relieved of the obligation to meet deadlines in this case for a period of  
20 90 days from the date of the filing of this Stipulation. If, within the 90 days, the Commission has  
21 considered and either approved or rejected the settlement offer, the SEC and Defendant Akbari will  
22 so inform the Court immediately.

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1 IT IS SO STIPULATED:  
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DATED: February 27, 2015

/s/ Susan F. LaMarca

Susan F. LaMarca, Esq.  
SECURITIES AND EXCHANGE  
COMMISSION  
44 Montgomery Street, Suite 2800  
San Francisco, CA 94104  
Counsel for the Plaintiff

/s/ William H. Kimball

William H. Kimball, Esq.  
LAW OFFICES OF WILLIAM H. KIMBALL  
803 Hearst Avenue  
Berkeley, CA 94710  
Counsel for Defendant Ammar Akbari

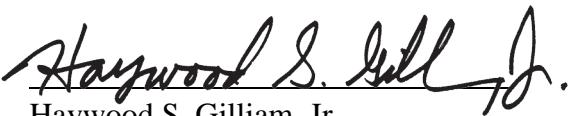
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1                   **[PROPOSED] ORDER**  
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4                   Good cause appearing from the above Stipulation, the requested 90-day suspension of all  
5 deadlines as to Defendant Ammar Akbari is hereby GRANTED. IT IS HEREBY ORDERED THAT  
6 the Plaintiff Securities and Exchange Commission and Defendant Ammar Akbari will report to the  
7 Court no later than 90 days from the date of entry of this Order to inform the Court whether a  
8 settlement between them has been approved by both parties.

9                   IT IS SO ORDERED.  
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12                  DATED: March 2, 2015  
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15                  Haywood S. Gilliam, Jr.  
16                  UNITED STATES DISTRICT JUDGE  
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## **ATTESTATION**

I, Susan F. LaMarca, am the ECF User whose identification and password are being used to file the Stipulation and Proposed Order. I hereby attest that each of the above parties or their representatives concurs in this filing to the extent indicated.

Dated: February 27, 2015

/s/ Susan F. LaMarca

Susan F. LaMarca

Attorney for Plaintiff

## SECURITIES AND EXCHANGE COMMISSION

## **CERTIFICATE OF SERVICE**

I, Karl Roeseler, am a citizen of the United States, over 18 years of age and not a party to this action. On March 2, 2015, I served the following documents:

• STIPULATION AND PROPOSED ORDER SUSPENDING DEADLINES AS TO  
DEFENDANT AKBARI

via e-mail and U.S. Mail, postage pre-paid, to the following:

Roshanlal Chaganlal  
4883 Thornpike Lane  
Dublin, CA 94568  
[rchaganlal@gmail.com](mailto:rchaganlal@gmail.com)

The following defendants were served via the Court's CM/ECF system:

William H. Kimball, Esq.  
Law Offices of William H. Kimball  
803 Hearst Avenue  
Berkeley, CA 94710  
Attorney for Defendant Ammar Akbari

Christopher Cannon, Esq.  
Sugarman & Cannon  
180 Montgomery Street, Suite 2350  
San Francisco, CA 94104  
Attorney for Defendant Saleem Khan

Charlene S. Shimada, Esq.  
Morgan, Lewis & Bockius LLP  
Three Embarcadero Center  
San Francisco, CA 94111-4067  
Attorney for Defendant Ranjan Mendonsa

I declare under penalty of perjury that the statements made above are true and correct.

Executed in San Francisco, California March 2, 2015.

/s/ Karl Roeseler  
Karl Roeseler